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September 28, 2012

Hon. Joseph F. Bianco  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Anilao, et. al. v. Spota, et. al.  
10 CV 00032-JFB-WDW


Dear Judge Bianco:

This office represents plaintiffs Juliet Anilao, Harriet Avila, Mark Dela Cruz, Claudine Gamaio, Elmer Jacinto, Jennifer Lampa, Rizza Maulion, James Millena, Theresa Ramos, and Ranier Sichon (the "Nurse Plaintiffs"). We write to reiterate a position that we perhaps did not make clear enough regarding the release of Grand Jury minutes.

The Plaintiffs will agree to any reasonable restrictions on the use of the minutes, including having the minutes reviewed at the Courthouse by attorneys only, taking all depositions that rely upon the minutes at the Courthouse and sealing the transcript of any portion of the deposition that concerns the minutes, and any other reasonable conditions prescribed by the Court to preserve the secrecy of the minutes.

I thank you for your attention to this matter.

Very truly yours,

  
JAMES O. DRUKER

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Cc (Via ECF): Sarah C. Lichtenstein, Esq.  
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